

MEMO ENDORSED



MURIEL GOODE-TRUFANT
Acting Corporation Counsel

**THE CITY OF NEW YORK
LAW DEPARTMENT**

100 CHURCH STREET
NEW YORK, NY 10007

MARK D. ZUCKERMAN
Senior Counsel
E-mail: mzuckerm@law.nyc.gov
Phone: (212) 356-3519
Fax: (212) 788-9776

November 22, 2024

VIA ECF

The Honorable Jessica G.L. Clarke
United States District Judge
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

Re: SeanPaul Reyes v. City of New York, 23 Civ. 6369 (JGLC)

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, representing defendant City of New York in the above referenced matter. The parties write jointly to respectfully request that their time be extended to submit a revised case management order from November 29, 2024 to December 20, 2024, and that discovery be stayed during that period of time. The reason for the request is that the Second Circuit Court of Appeals heard oral argument on the City's appeal of this Court's preliminary injunction order on November 13, 2024, and decision was reserved. Both sides continue to agree that the Second Circuit's decision on the City's appeal of this Court's preliminary injunction order may impact the scope of the remaining discovery to be taken in the case. Further, the Second Circuit's decision may also impact the possibility of any negotiated resolution of this case, which is another topic that the Court's Case Management Order requires to be addressed. Thus, the parties jointly respectfully request that in the interest of judicial economy and the preservation of the parties' resources, that the parties' time to submit a revised case management order be extended to December 20, 2024 and that discovery be stayed during that time frame.

This is the second such request.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman
Mark D. Zuckerman
Senior Counsel

cc: All Counsel (via ECF)

Application GRANTED. The parties' deadline to submit a proposed amended case management plan and scheduling order is hereby extended to **December 20, 2024**. It is FURTHER ORDERED that discovery in this action shall be STAYED until that time. The Clerk of Court is respectfully directed to terminate ECF No. 111.

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge

Dated: November 27, 2024
New York, New York